

OECA Enforcement Case Conclusion Data Sheet

FY2014

A. Case and Facility Background

1. (a) Enforcement Action ID 06-2019-3342
 (b) Enforcement Action Name SN Operating-2018 Eagle Fort Flyover-Hausser D, G, J Sites-AOC_NOV

Judicial District: NA - administrative order
 Court Docket Number: NA - administrative order
 Court Case Name: NA - administrative order
 DOJ Number: NA - administrative order
 DOJ Case Name: NA - administrative order

2. (a) CERCLIS Site ID __ - ____ - ____
 (b) CERCLIS Site Name _____

3. Final Order Type

Judicial

- ☐ (a) Consent Decree or Court Order Resolving a Civil Judicial Action
☐ (b) Judicial Order Amending or Enforcing Consent Decree
☐ (c) Proposed Judicial Settlement
☐ (d) Enforceable Final Order Activity Producing Results
☐ (e) Non-Lead Participant in Multi-Regional Case
☐ (f) Post-Final Order Record of Decision (ROD)

Administrative

- ☒ (a) Administrative Compliance Order
☐ (b) Amendment to Administrative Order or Consent Agreement
☐ (c) Administrative Penalty Order Order (with or without injunctive relief)
☐ (d) Proposed Administrative Settlement
☐ (e) Enforceable Final Order Activity Producing Results
☐ (f) EPA/Customs Import Enforcement Action
☐ (g) Federal Facility Agreement (FFA)
☐ (h) Federal Facility Compliance Agreement
☐ (i) Federal Facility Record of Decision (ROD)
☐ (j) Post-Final Order Record of Decision (ROD) (not Federal Facility)
☐ (k) Final Order Revoking or Suspending a Permit
☐ (l) Notice of Determination
☐ (m) Non-Lead Participation in Multi-Regional Case
☐ (n) Superfund Administrative Order for Cost Recovery
☐ (o) Stipulated Penalty Assessed Against Previous Action

4. Was Alternative Dispute Resolution used in this action? (Y/N) N

5. Was an Environmental Management System requested? (Y/N) N

6. (a) Administrative Conclusion Dates: _____ Final Order Issued: 07/08/2019 Estimated Termination Date: 05/08/2020

Actual Termination Date: _____ Most Recent Amendment Date: _____

Agreement in Principle Date: _____

- (b) Civil Judicial Conclusion Dates: CD Lodged _____ CD Entered: _____ Estimated Termination Date: _____

7. Defendant(s)/Respondent(s) Sanchez Oil & Gas Corporation (dba SN Operating)

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8. Enforcement Case Summary for Public Distribution:

EPA contracted helicopter flyovers of a portion of the Eagle Ford Shale area during May 8-16, 2018, to assess emission sources using Optical Gas Imaging (OGI) technology. OGI video captures for these oil and gas facilities showed unauthorized hydrocarbon emissions at the Facilities. EPA sent SN Operating a letter on February 14, 2019, regarding observations of unauthorized hydrocarbon emissions made during the helicopter flyovers. The letter included a disc with the OGI video captures of the Facilities. SN Operating verified ownership of the Facilities in the company's email response dated February 28, 2019. Specific SIP violation citations are provided as follows: 1. General Requirements not being met as required under 30 TAC 106.4(b) and (c). 2. Failure to establish and maintain a program to replace, repair, and/or maintain facilities to keep them in good working order, in a manner consistent with good air pollution control practices, as required under 30 TAC 106.359(c)(1) and (2). 3. General Requirements not being met as required under 30 TAC 116.620. 4. Tanks with unauthorized emissions in violation of permit representations made under section (e)(6) of the Air Quality Standard Permit for Oil and Gas Handling and Production Facilities, effective November 8, 2012. Failure to establish and maintain a program to replace, repair, and/or maintain facilities to keep them in good working order, in a manner consistent with good air pollution control practices, as required under sections (e)(1)(A) and (C) of the Air Quality Standard Permit for Oil and Gas Handling and Production Facilities, effective November 8, 2012.

(Sensitive comments)

9. Federal Statute(s) violated (e.g., CAA, EPCRA, etc.) (Not U.S.C. or CFR)

CAA

10. National Enforcement Initiative (Y/N) Y If Yes, \checkmark option(s) below:() Air Toxics () Combined Animal Feeding Operations: CAFO CAFO Regional Initiative Areas(X) Energy Extraction () Mining/Mineral Processing: Mining Mineral Processing() Municipal Infrastructure: CSO > 50K SSO > 50K MS4 population > 10,000() NSR/PSD: Coal Fired Power Plants Cement Glass Acid11. Is this a Multi-Regional case: (Y/N) N

12. Facility Information

(a) Facility Name(s): SN OPERATING-HAUSER D PAD, HAUSER G PAD, HAUSER J PAD(b) Facility Address(s) Street: Used Lat/Long for each site City: Near Dilley County: Frio St: TX Zip: 78017

B. Penalty (if there is no penalty or cost recovery, enter 0 and proceed to #17; if there is Cost Recovery, proceed to #16)

13 (a) Notice Pleading? (Y/N) _____

(b) For multimedia actions, Cash Civil Penalty Amount Required by statute:

Statute	Amount
<u>_____</u>	\$ <u>0.00</u>
<u>_____</u>	\$ <u>_____</u>

14. Penalty Assessed to be Paid to:

a. EPA \$ 0.00

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b. Federal Agency/Dept. Other than EPA: \$ _____

c. State/Local Agency: \$ _____

15. Total Penalty Collected (if known): \$ 0.00

C. Cost Recovery

16. Amount of cost recovery required: \$ 0.00 EPA \$ _____ State and/or Local Government \$ _____ Other

D. Supplemental Environmental Project (SEP) Information (Y/N) If Yes, for each SEP provide the following: Not applicable - no SEP

17. Is Environmental Justice addressed by impact of SEP? (Y/N) _____

18. SEP description: _____

19. Category of SEP(s)

- ☐ (a) Public Health
☐ (b) Pollution Prevention (Complete Q. 21)
 ☐ (1) Equipment/technology modifications
 ☐ (2) Process/procedure modification
 ☐ (3) Product reformulation/redesign
 ☐ (4) Raw materials substitution
 ☐ (5) Improved housekeeping/O&M/training/inventory-control
 ☐ (6) In-process recycling
 ☐ (7) Energy efficiency/conservation
☐ (c) Pollution Reduction (Complete Q. 21)
☐ (d) Environmental Restoration and Protection
☐ (e) Assessments and Audits
☐ (f) Environmental Compliance Promotion
☐ (g) Emergency Planning and Preparedness
☐ (h) Other Program Specific SEP

20. Cost of SEP. Cost calculated by the Project Model is required. \$ _____

21. Quantitative environmental pollutants and/or chemicals and/or waste-streams, amount of reductions/eliminations (e.g., emissions/discharges) SEP (cont'd)

<u>Pollutant/Chemical/Waste Stream</u>	<u>Amount</u>	<u>Unit</u>	<u>Impacted Media</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

Units

Pounds

Cubic Yards

Acres

Linear Feet ss

Linear Feet ms

Linear Feet ls

Impacted Media (applicable to Removal and Restoration)

Land, Soil

Land, Soil, Water (navigable/surface), Water (ground)

Water (wetlands)

Water (wetlands)

Water (wetlands)

Water (wetlands)

Units

BTUs

Impacted Media (applicable to Reduction on Ongoing Release)

Air

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Gallons	Land, Soil
Pounds	Air, Land, Soil, Water (navigable/surface), Water (wastewater to POTW)
Pounds/yr	Air, Land, Soil, Water (navigable/surface), Water (wastewater to POTW)
Cubic Yards	Air, Land, Soil, Water (ground), Water (navigable/surface), Water (wastewater to POTW)
People	Water (drinking)
Buildings	Buildings/Housing/Schools
Schools	Buildings/Housing/Schools
Single Family Housing (SF Housing)	Buildings/Housing/Schools
Multi-Family Housing (MF Housing)	Buildings/Housing/Schools
Wells	Water (underground source)

<u>Units</u>	<u>Impacted Media (applicable to Prevention of Future Release)</u>
Acres	Water (wetlands)
Cubic Yards	Land, Soil
Pounds	Air, Land, Water (navigable/surface)
Pounds/yr	Air, Land, Water (navigable/surface)
Gallons	Land, Soil, Water (navigable/surface)
Gallons/yr	Land, Soil, Water (navigable surface)
Buildings	Buildings/Housing/Schools
Schools	Buildings/Housing/Schools
Single Family Housing (SF Housing)	Buildings/Housing/Schools
Multi-Family Housing (MF Housing)	Buildings/Housing/Schools
Wells	Water (underground source)

E. Cost of Complying Action(s)/Injunctive Relief (Non-SEP) (APO's w/o inj. relief [3(c) above], Superfund Admin. Cost Recovery Agreements [3(n) above] SKIP THIS SECTION)

22. Cost of actions. (Actual cost data supplied by violator is preferred figure.): \$ Information not furnished by company (core program)

Indicate OECA National Enforcement Initiative(s) amounts below (if applicable):

NEI: _____; \$ NA

NEI: _____; \$ _____

NEI: _____; \$ _____

F. Quantitative Environmental Impacts

23. What action did the violator accomplish prior to receipt of settlement/order or will take to return to compliance or meet additional requirements (other than what has already been reported on the Inspection Conclusion Data Sheet (ICDS)). This may be due to settlement/order requirements or otherwise required by statute or regulation (e.g. actions related to an APO which did not specify compliance requirements). Select the appropriate outcome category and action from the list below.

<u>Outcome Category</u>	<u>Complying Action</u>
Removal and Restoration	Ex-Situ Treatment In-Situ Treatment Removal of Carcass Debris Removal of Contaminated Media Removal of Released Pollutants (includes oil spills) Wetlands Creation Wetlands Restoration

<u>Outcome Category</u>	<u>Complying Action</u>
Reduction of Ongoing Releases	Implement BMP: Surface Water Runoff Implement BMP: Lagoon/Storage Pond Leaks or Spills Implement BMP: Manure Over Application

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	Implement BMP: Animal Bedding Leachate Implement BMP: Silage Leachate Implement BMP: Proper Carcass Disposal HW Use Reduction HW Treatment HW Disposal Change HW Storage Change HW Waste Containment Use Reduction Treatment Disposal Change Storage Change Waste Containment Heat Reduction NPDES Discharge Change NPDES Process Change Implement BMP: Stormwater from Existing Construction Activities Implement BMP: Industrial Stormwater Implement BMP: Separate Municipal Stormwater Systems (MS4s) Implement BMP: Other CSO Flow Reduction CSO Primary or Secondary Treatment SSO CMOM SDWA Process Change Biosolids Process Change Pesticide Destroyed (In Commerce) Import Pesticide Returned to Foreign Origin Pesticide Returned to Compliance by Manufacturer/Producer (Domestic) Proper Pesticide Use Cease Pesticide Sale, Distribution Pesticide Advertising Claim Removed Secondary Containment Change (on-going) Pesticide Container Change (on-going) Offset Project (mobile sources) Retire Pollution Credits (mobile sources) Retire Pollution Credits (stationary sources) Replace or Remediate Engines/Vehicles (In Commerce) Source Reduction Emissions Change X- Leak Repair (LDAR) Abatement (non-removal remediation) Implement Asbestos Management Plan Handling PCBs (disposal change) UIC Plug and Abandon (w/ leaks) Tank Repair Tank Removal Tank Storage Change
Prevention of Future Releases	Proper Waste Transport Proper Waste Storage Proper Waste Containment Proper Waste Disposal Proper Waste Export Cathodic Protection System Maintenance/Repair Oil Storage Change Compliance/Warranty Schedule Change Replace or Remediate Engines/Vehicles (Future Production) Plan Implementation Pesticide Production Ceased Pesticide Label Revised (Future Production)

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	Pesticide Advertising Claim Removed (Future Production)
	Pesticide Manufacturing Change
	Pesticide Container Change
	Pesticide Secondary Containment Change
X-	Leak Detection (LDAR)
	Risk Management Plan Implemented
	Industry Standards Adopted
	Toxic Material Abatement (w/o existing release)
	Preventative Management Plan Implemented
	Plug and Abandon (w/o leaks)
	Secondary Containment (UST)
	Implement Corrosion Protection System
	Implement Tank Overfill/Spill Protection
	Implement Release Detection System (UST)
	Tank Closure
	Wetlands Preservation

24. Quantitative environmental impact of actions described in item #23: (Add additional pollutants on blank sheet). For each action, provide the following:

Complying Action: Leak Repair (LDAR) / Leak Detection (LDAR)

<u>Pollutant/Chemical/Waste Stream</u>	<u>Amount</u>	<u>Unit</u>	<u>Impacted Media</u>	<u>NEI (please specify)</u>
Volatile Organic Compounds	5829941.76	Pounds	Air	2019 - Energy Extraction -
Hydrogen Sulfide	377385.36	Pounds	Air	Land Based Gas Extraction & Production

Complying Action: _____

<u>Pollutant/Chemical/Waste Stream</u>	<u>Amount</u>	<u>Unit</u>	<u>Impacted Media</u>	<u>NEI (please specify)</u>

Complying Action: _____

<u>Pollutant/Chemical/Waste Stream</u>	<u>Amount</u>	<u>Unit</u>	<u>Impacted Media</u>	<u>NEI (please specify)</u>

Complying Action: _____

<u>Pollutant/Chemical/Waste Stream</u>	<u>Amount</u>	<u>Unit</u>	<u>Impacted Media</u>	<u>NEI (please specify)</u>

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Units

Pounds
Cubic Yards
Acres
Linear Feet ss
Linear Feet ms
Linear Feet ls

Impacted Media (applicable to Removal and Restoration)

Land, Soil
Land, Soil, Water (navigable/surface), Water (ground)
Water (wetlands)
Water (wetlands)
Water (wetlands)
Water (wetlands)

Units

BTUs
Gallons
Pounds
Pounds/yr
Cubic Yards
People
Buildings
Schools
Single Family Housing (SF Housing)
Multi-Family Housing (MF Housing)
Wells

Impacted Media (applicable to Reduction on Ongoing Release)

Air
Land, Soil
Air, Land, Soil, Water (navigable/surface), Water (wastewater to POTW)
Air, Land, Soil, Water (navigable/surface), Water (wastewater to POTW)
Air, Land, Soil, Water (ground), Water (navigable/surface), Water (wastewater to POTW)
Water (drinking)
Buildings/Housing/Schools
Buildings/Housing/Schools
Buildings/Housing/Schools
Buildings/Housing/Schools
Water (underground source)

Units

Acres
Cubic Yards
Pounds
Pounds/yr
Gallons
Gallons/yr
Buildings
Schools
Single Family Housing (SF Housing)
Multi-Family Housing (MF Housing)
Wells

Impacted Media (applicable to Prevention of Future Release)

Water (wetlands)
Land, Soil
Air, Land, Water (navigable/surface)
Air, Land, Water (navigable/surface)
Land, Soil, Water (navigable/surface)
Land, Soil, Water (navigable surface)
Buildings/Housing/Schools
Buildings/Housing/Schools
Buildings/Housing/Schools
Buildings/Housing/Schools
Water (underground source)

(Note: When entering quantitative data into ICIS, the system will automatically filter the possible selection for complying action types, units, and potentially impacted media).

G. Non-Quantitative Activities/Impacts (Non-SEP) Choose all that apply:**Outcome Category****Complying Action**

Work Practices

Training
Certification and Accreditation
Labeling - Identification
Labeling – Material Management
Auditing
Cease Activity
Record-keeping
Testing/Sampling
Reporting

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	Environmental Management Review General Duty CAA 112(r)(1) Monitoring Planning Information Letter Response Notification Permitting Hazardous Waste Identification Manifesting UST Release Detection Financial Responsibility Requirements Institutional Controls RI/FS or RD (CERCLA) Site Assessment/ Characterization (CERCLA) Provide Site Access (CERCLA) Storm Water Site Inspections Asbestos Inspections Develop CMOM Program (CWA) FIFRA Establishment Registration Obtained FIFRA Establishment Terminated Product Registration UIC Demonstrate Mechanical Integrity Work Practices
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